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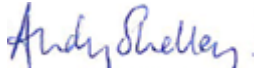

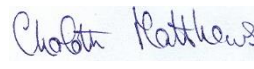
Site A, Willow Way, Sydenham: Heritage Addendum

Client:

Kitewood

PCA Heritage ref:

10232/R03

Document Number	10232/R03	
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-	28/04/2023	For issue
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1. INTRODUCTION

1.1. Introduction

- 1.1.1. PCA Heritage has been commissioned by Pre-Construct Archaeology on behalf of their client Kitewood Estates Ltd (Kitewood), the appellant, to prepare a heritage addendum in support of an appeal of the London Borough of Lewisham's (hereafter the 'LPA') decision to refuse permission for a development at Site A, Willow Way, Sydenham (hereafter the 'site', Fig 1). The planning application number is DC/22/129789.
- 1.1.2. The heritage addendum provides an historic environment response to LPA and conservation officer's comments received 16 March 2023 (repeated in the Planning Officer's report) regarding impacts on heritage assets contained in the planning officer's report (reference DC_22_129789-OFFICERS_DELEGATED_REPORT-1178451), because the LPA did not allow time to respond prior to the determination of the application on 23 March 2023.
- 1.1.3. The planning application was supported by a heritage statement (PCA Heritage 2022, *Site A, Willow Way, Sydenham: Heritage Statement*) and an archaeological desk-based assessment (hereafter DBA; PCA Heritage 2022a, *Site A, Willow Way, Sydenham: Archaeological Desk-based Assessment*). This heritage addendum makes reference to the heritage statement, which should be referred to alongside the addendum. The heritage statement considered matters relating to buildings, conservation areas and parks and gardens; all archaeological matters were considered in the archaeological desk-based assessment and did not form part of the LPA's response.
- 1.1.4. In the heritage statement the term heritage value is used to mean the qualities that make an otherwise ordinary place a heritage asset. Other terms for heritage value exist, including 'heritage significance' and 'heritage importance'. All three terms are equally interchangeable.

2. SUMMARY RESPONSE TO THE LOCAL AUTHORITY'S COMMENTS

2.1. Delegated officer report

- 2.1.1. The officer report discussed the proposed development in relation to surrounding heritage assets under the heading 'Impact on Heritage Assets' (paragraphs 225 to 257).
- 2.1.2. Paragraphs 225 to 233 summarise the policies and guidance relevant to heritage assets in the borough.
- 2.1.3. Paragraphs 234 to 238 set out that the conservation officer's comments which follow refer to Sydenham Park Conservation Area, Kirkdale Area of Special Local Character (ASLC) and two listed buildings on Kirkdale.
- 2.1.4. Under the heading 'Conservation Comments on Impact on Conservation Areas', paragraphs 239 to 244 summarise the conservation officer's opinion of the height of the proposed development in relation to nearby buildings. Paragraph 241 identifies an impact to the

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conservation area arising from an 'uncharacteristic height' which appears 'dominating and un-neighbourly'. These opinions are considered in paragraph 2.1.6, below.

2.1.5. Paragraphs 245 and 246 provide advice on the likely effectiveness of a number of the viewpoints proposed for use in townscape analysis. This townscape advice has been followed by the client team. Townscape AVRs (that is, accurate visual representations) are being produced and will be submitted to support the appeal.

2.1.6. Paragraph 247 begins with the statement 'On the basis of the information submitted so far, the proposal is likely to cause a moderate degree of harm to the setting of the CA (less than substantial in NPPF terms)'. This statement is at variance to the conclusions reached in the heritage statement, specifically paragraph 8.15.3, which concludes:

The site is bound on one and a half sides by the conservation area, and the proposed development will therefore introduce new, taller buildings of greater mass to the edge of one part of the conservation area. In views to the west from Sydenham Park, the proposed development will be visible between the buildings which line the west side of the road. This will have the effect of making the skyline in these views a uniform height, thus changing one part of the setting of the heritage asset. This change will have no effect on the architectural interest of the buildings within the conservation area, nor the legibility of its historic character. There will be no change to the ability of an observer to comprehend immediately the characteristics which give the conservation area its heritage value.

2.1.7. The conservation officer's statement that 'the proposal is likely to cause a moderate degree of harm to the setting of the CA (less than substantial in NPPF terms)' relates to change to setting rather than to impact on the **heritage significance** (value) of the heritage asset (CA). Section 16 of the NPPF (paragraph 195) requires 'local planning authorities to identify and assess the particular **significance** of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset)'. Section 16 of the NPPF (paragraph 200) states 'Any harm to...the **significance** of a designated heritage asset (...from development within its setting), should require clear and convincing justification'. As described in 8.15.3 above, the heritage statement acknowledges that there will be change to the setting of the Sydenham Park CA but that the proposal will not affect its **significance** as expressed through its architectural interest and historic character. The proposal will therefore cause no harm (in NPPF terms) to the **significance** of the heritage asset (CA).

2.1.8. The second part of paragraph 247 provides recommendations for changes to the positioning and height of the proposed development, modifications to the built form of the proposed development and the provision of open space and tree planting. These are matters best addressed by the client's architect.

2.1.9. Paragraph 248 summarises the conservation officer's support for the architectural elevational design and materiality of the proposed development, subject to the points they raise in paragraph 247 being addressed.

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2.1.10. Paragraph 249 provides officer's support for the conservation officer's view that townscape views need to be submitted to consider the points raised in paragraphs 239 to 248. Townscape AVRs are being produced and will be submitted to support the appeal.

2.1.11. Paragraph 249 adds the officer's view that 'the specific impact on the Locally Listed Bricklayers Arms pub' should be addressed by the preparation of townscape views. Townscape AVRs which include the Bricklayers Arms are being produced and will be submitted to support the appeal. However, on this point, it should be noted that the heritage statement (in paragraph 8.6.1) did not identify any potential impact on the Bricklayers Arms' heritage value, instead concluding:

The Bricklayers Arms public house derives its heritage value from its architectural and historic interest. Its prominent location in the angle between two roads gives it visual interest and contributes to the local streetscape. Its setting is the neighbourhood within which it sits and from which it historically drew its clientele. The visual connection the premises has with The Woodman public house to the south-west (see Plate 12) also contributes to its historic interest. The site is situated little more than 25m south-east of the Bricklayers Arms and the proposed development will add new, taller buildings of greater mass to the immediate environs of the public house. This will be a change to the heritage asset's setting, but it will not be a change to the legibility of the building's architectural and historic interest, nor the ability of the observer to understand immediately the building's function.

2.1.12. Paragraph 249 concludes that there is currently insufficient information and unresolved design issues and officers cannot therefore 'conclude that the proposal would conserve or enhance the conservation areas or that any harm could be outweighed by public benefits and this will form part of the reason for refusal'. The townscape matter referred to here is being addressed by the production of a series of AVRs; design is a matter for the client's architect.

2.1.13. Under the title 'Conservation Comments on Impact on Kirkdale ASLC' paragraph 250 sets out the conservation officer's view that 'The proposal will have some impact on the setting of the Kirkdale ASLC due to available views down Willow Way'. The impact referred to here is linked in paragraph 250 to the 'loss of visibility of the mature large canopy trees in the CA'. This is a townscape and visual impact matter: from a historic environment perspective there would be no effect on the heritage value of the ASLC, as discussed in paragraph 2.1.13 below.

2.1.14. As the officer's report acknowledges, Kirkdale ASLC has not been consulted upon or formally adopted. Although some of its component parts, in the form of the listed buildings of 124-128, Kirkdale SE26 (NHLE 1080021; heritage statement reference BHA043) and High Street Buildings (NHLE 1392512; BHA056), and the locally-listed buildings Fox and Hounds public house, Kirkdale (BHA019) and 89-91 Kirkdale (BHA059), were identified and assessed in the heritage statement, the ASLC itself was not. However, a brief assessment set out in this paragraph (2.1.13) identifies that its heritage value is formed by the architectural interest and complementary functions of its buildings (listed and otherwise), its historical interest as a mid-Victorian 'neighbourhood centre', and the artistic interest of its topography, namely its climb from the junction of Jews Walk, Sydenham Park and The Parade to the higher ground around and beyond its junction with Dartmouth Road. Its setting is formed by the residential streets

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which meet it from both sides, from where its patrons were historically and are currently drawn. The presence or otherwise of trees in adjoining streets does not have a bearing on its heritage value, although it may or may not be of relevance from a townscape perspective.

- 2.1.15. Paragraphs 251 to 253 discuss the lack of trees in the proposed development. This matter is best addressed by other members of the client team.
- 2.1.16. Under the heading 'Conservation Comments on Listed Buildings', a point is made in paragraphs 254 and 255 that the setting of the listed buildings on Kirkdale – or at least those closest to the junction with Willow Way - 'could be mitigated by providing sufficient space for street tree planting in front of the site'. The lack of trees is considered by the conservation officer to give rise to a low degree of harm to the setting of the listed buildings (less than substantial). Again, this appears to be a townscape and visual impact matter, as the presence or absence of nearby trees would have no effect on the heritage value of the listed buildings. However, it is worth noting as identified in the constraints mapping, due to extensive underground services and utilities underneath the footpaths running along Willow Way, there is minimal opportunity for street tree planting. (Assessment of the heritage value of the listed buildings is provided in Sections 7.12 and 7.13 of the heritage statement.)
- 2.1.17. Paragraphs 256 and 257 provide a summary of the officer's views. In paragraph 256 the officer identifies harm to the character and appearance of Sydenham Park Conservation Area. Whilst these are matters for the client's townscape and architect consultants to consider, the heritage statement, whilst identifying a proposed change to one part of the setting of the conservation area, did not identify any adverse impact on the conservation area's overall heritage value arising from the proposed development.
- 2.1.18. In paragraph 257 the officer states that they are unable to conclude, on the basis of the submitted information, that the proposal would preserve the setting of the listed buildings. The proposed development will change one part of the surroundings of the listed buildings on Kirkdale. As explained in Section 8.12 of the heritage statement, although the proposed development may possibly be partially visible in some high-level views from 124-128, Kirkdale SE26 (NHLE 1080021; BHA043), it will not be visible in views of the asset from Kirkdale, from where the asset's heritage value is best appreciated. Its architectural and historic interest will not be affected by the proposed development, and neither will the relationship with Kirkdale and other nearby commercial premises which contribute to 124-128, Kirkdale SE26's heritage interests. Section 8.13 of the heritage statement identifies that although the proposed development will be visible from High Street Buildings (NHLE 1392512; BHA056), it will not be visible in the views which are available of High Street Buildings, all of which are from Kirkdale or Willow Way. High Street Buildings' architectural and historic interest (the characteristics from which the heritage asset's heritage value is formed) will not be affected, and neither will its relationship with Kirkdale and other nearby commercial premises.

2.2. Conservation officer's comments

- 2.2.1. The conservation officer's comments in document 'Willow Way Conservation Comments 129789' are reproduced in the officer's report and have been considered above.

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2.3. Table of responses

2.3.1. Table 1 below lists the responses provided in this heritage addendum to each paragraph of the officer's report.

Table 1: Response concordance table

Officer's report paragraph no.	Response	Heritage addendum paragraph no.
225	No historic environment response required	n/a
226	No historic environment response required	n/a
227	No historic environment response required	n/a
228	No historic environment response required	n/a
229	No historic environment response required	n/a
230	No historic environment response required	n/a
231	No historic environment response required	n/a
232	No historic environment response required	n/a
233	No historic environment response required	n/a
234	No historic environment response required	n/a
235	No historic environment response required	n/a
236	No historic environment response required	n/a
237	No historic environment response required	n/a
238	No historic environment response required	n/a
239	No historic environment response required	n/a
240	No historic environment response required	n/a
241	The conservation officer's identification of an impact to the conservation area arising from 'uncharacteristic height' is at variance to the conclusions drawn in the heritage statement, specifically paragraph 8.15.3.	2.1.6
242	No historic environment response required	n/a
243	No historic environment response required	n/a
244	No historic environment response required	n/a
245	No historic environment response required	n/a

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246	No historic environment response required	n/a
247	The conservation officer's statement 'On the basis of the information submitted so far, the proposal is likely to cause a moderate degree of harm to the setting of the CA (less than substantial in NPPF terms)' is at variance to the conclusions reached in the heritage statement, specifically paragraph 8.15.3.	2.1.6
248	No historic environment response required	n/a
249	The delegated officer's view is that there is a 'specific impact' to the Bricklayers Arms public house on Dartmouth Road in relation to views. The heritage statement (in paragraph 8.6.1) did not identify any potential impact to the Bricklayers Arms' heritage value.	2.1.10
250	The conservation officer's view is that 'The proposal will have some impact on the setting of the Kirkdale ASLC'. From a historic environment perspective there would be no adverse effect on the heritage value of the ASLC.	2.1.12; 2.1.13
251	No historic environment response required	n/a
252	No historic environment response required	n/a
253	No historic environment response required	n/a
254	No historic environment response required	n/a
255	No historic environment response required	n/a
256	The officer identifies harm to the character and appearance of Sydenham Park Conservation Area. Section 8.1.15 of the heritage statement, whilst identifying a proposed change to one part of the setting of the conservation area, did not identify any adverse effect on the conservation area's overall heritage value arising from the proposed development.	2.1.16
257	The officer states that they are unable to conclude, on the basis of the submitted information, that the proposal would preserve the setting of the listed buildings. The potential for impacts to the heritage value of listed buildings on Kirkdale is discussed in Sections 8.12 and 8.13 of the heritage statement.	2.1.17

3. BIBLIOGRAPHY

PCA Heritage, 2022, *Site A, Willow Way, Sydenham: Heritage Statement*, unpublished report 10232/R02

PCA Heritage, 2022a, *Site A, Willow Way, Sydenham: Archaeological Desk-based Assessment*, unpublished report 10232/R01